

ATTACHMENT A

Voluntary Product Stewardship Programs

- o The Kerr-McGee Refining Corporation, the Chevron Chemical Company, CITGO Refining Chemicals, Inc., Sun Company, Inc., the E. I. DuPont de Nemours Company, the Huntsman Corporation, and the Phillips Petroleum Company, the major manufacturers of cyclohexane, signed a TSCA §4 Enforceable Consent Agreement (ECA) to conduct certain needed health effects tests on cyclohexane.
- o The TSCA §4 ECA became effective on November 18, 1994, the date of its publication in the *Federal Register* (59 FR 59660). This ECA also resulted from OPPT's "Open Season" initiative wherein EPA solicited (57 FR 31714) testing proposals from industry on chemicals for which final TSCA §4 test rules had not yet been issued.
- o A unique feature of the cyclohexane negotiations is that the 7 companies have agreed to spearhead a voluntary activity designed to bring about a major overall reduction in the amounts of cyclohexane released to the environment by their customers.
- o In January 1995, the members of the CMA Cyclohexane Panel issued (per the TSCA §4 ECA) a letter to the 38 TRI facilities emitting cyclohexane. OPPT was given the opportunity to comment on that letter and offered a number of suggested language changes in order to "firm-up" the letter. OPPT also suggested that a letter from the AA/OPPTS to the companies represented on the CMA Cyclohexane Panel addressing the need to reduce cyclohexane exposure be included in the letter from producers to the 38 TRI facilities. All of the OPPT suggestions were adopted.
- o Over the next several years, OPPT will review EPCRA TRI reporting for cyclohexane in order to determine the effectiveness of the exposure reduction activity and the possible need for oncogenicity testing for cyclohexane.